

For office use only
Agent number:
Representor number:
Representation number:



Draft North East Cambridge Area Action Plan Consultation 2020

Response Form

How to use this form

If you are able to, please comment online at www.greatercambridgeplanning.org/nec. You can comment on part or all of the Draft Area Action Plan online, and your response can be analysed more quickly and efficiently if you do so.

If you wish to comment using this form, please note we will transcribe all your responses into our online consultation system, and they will be published as part of our consultation feedback.

There are three parts to this form. Please fill in the form electronically or in black ink.

All comments must be received by **5pm on Monday 5 October 2020**. Thank you for taking the time to respond to this consultation.

Part A – Your details

- We ask for your name and postal address because the Councils must comply with national regulations for plan-making. We also ask for contact details but it is optional for you to give these. Please be aware that if you do not provide contact details and 'opt-in' to future notifications, we will not be able to notify you of the future stages of the North East Cambridge Area Action Plan.
- Your name will be published alongside your representations on our website, but your email address, address and phone numbers will not.

Part B - Response to the ten big questions

- This section asks you to answer ten important questions about the Area Action Plan. You can answer some or all.
- Each question has a multiple choice answer and the opportunity to add further comments.

Part C – Comments on specific policies and supporting documents

- You can comment on specific policies in the draft Area Action Plan, and on the draft Sustainability Appraisal, draft Habitats Regulations Assessment and draft Policies Map.
- Please copy this part of the form as many times as you require. You should complete a separate response for each policy or supporting document you wish to comment on.

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or nec@greatercambridgeplanning.org

Part A – Your Details

Please note that we cannot formally register your comments without your name and postal address, because the Councils must comply with national regulations for plan-making.

We also ask for contact details but it is optional for you to give these.

If you do not provide contact details and 'opt-in', we will not be able to notify you of the future stages of the North East Cambridge Area Action Plan.

| | | |
|--|---|---|
| Name: | R John Willis | Agent's name: (if applicable) |
| Name of organisation: (if applicable) | Fulbourn Swifts Group Action for Swifts Over and Swavesey Swift Conservation Project | Name of Agent's organisation: (if applicable) |
| Address: |  | Agent's Address: |
| Postcode: |  | Postcode: |
| Email (optional): |  | Email (optional): |
| Telephone (optional): | | Telephone (optional): |

| | | |
|--|-------|------------|
| Signature: | Date: | 01/10/2020 |
| If you are submitting the form electronically, no signature is required. | | |

Data Protection

We will treat your data in accordance with our [Privacy Notice](#). Information will be used by South Cambridgeshire District Council and Cambridge City Council solely in relation to the North East Cambridge Area Action Plan. Please note that all responses will be available for public inspection and cannot be treated as confidential. Comments, including your name, are published on our website, but we do not publish your address or contact details. **By submitting this response form you are agreeing to these conditions.**

The Councils are not allowed to automatically notify you of future consultations unless you 'opt-in'. Do you wish to be kept informed about future planning consultations run by the Greater Cambridge Planning Service on behalf of Cambridge City Council and South Cambridgeshire District Council?

Please tick: Yes No

Part B – Response to the ten big questions

1. What do you think about our vision for North East Cambridge?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Further comments:

2. Are we creating the right walking and cycling connections to the surrounding areas?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

3. Are the new 'centres' in the right place and do they include the right mix of activity?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

4. Do we have the right balance between new jobs and new homes?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

5. Are we are planning for the right community facilities?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

6. Do you think that our approach to distributing building heights and densities is appropriate for the location?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

7. Are we planning for the right mix of public open spaces?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

8. Are we doing enough to improve biodiversity in and around North East Cambridge?

- Yes, completely
- Mostly yes

We are in broad agreement with the content of Section '4.4 *Biodiversity*' and the '*Policy 5: Biodiversity Net Gain*'. However, we have strong concerns that with the inevitable focus on the metric for biodiversity net gain, which applies to green habitats only, that other important aspects for gains in biodiversity such as integral bird bricks in all dwellings (MKA Biodiversity Assessment Recommendation 21 page 38) will be lost.

On page 70 of the Draft NE Cambridge AAP it is noted that existing habitats support a number of species including Common Swift and House Sparrow and on page 71 there is a brief reference to National Planning Policy Guidance, which also notes that '*relatively small features such as swift bricks and bat boxes can achieve important benefits for specific species*'

This is an important part of bringing nature closer to people together with green roofs and green infrastructure such as native hedges and shrubs close to buildings. This can provide shelter and food for birds and other creatures and a pleasant green environment adjacent to homes rather than these being surrounded with largely hard landscaping.

We urge that the wording in *Policy 5* should be strengthened to specifically include reference to integral swift bricks in all buildings at a ratio of at least 1:1 per dwelling with adjusted provision for blocks of flats, schools, community buildings and commercial premises, together with bat boxes, green roofs and adjacent green infrastructure. Please see more detailed comments in response to *Policy 5*.

Submitted by a community action team including **Action for Swifts** (established 1995) Fulbourn **Swifts Group** (established 2011) and **The Over and Swavesey Swift Conservation Project 2020** working for the conservation of swifts and other threatened species in the Greater Cambridge area. We are actively involved in practical swift conservation, nest brick and nest box design, planning processes, monitoring of nest brick and nest box installations in new developments, advising commercial swift nest box designers, house designers and developers both locally and nationally.

- Neutral
- Mostly not
- Not at all

9. Are we doing enough to discourage car travel into this area?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

10. Are we maximising the role that development at North East Cambridge has to play in responding to the climate crisis?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

Part C – Comments on specific policies and supporting documents

| Document details: | |
|--|--|
| Which document are you commenting on? (please tick) | <input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map |
| Policy or section of supporting document that you are commenting on (Please state and be as precise as possible) | Policy 5: Biodiversity and Net Gain |
| Is your comment (tick one): | <input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object |

Comments:

Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.

Please copy this page for each policy or part of the document you are responding to.

Currently the focus of **Policy 5, 'Biodiversity and Net Gain'** is understandably on green habitats away from new dwellings and on using the metric for measuring net gain. However, there is no specific reference to nest box provision in line with National Planning Guidance, although this could be covered within the very general statement:

'Within North East Cambridge, development proposals shall take all practicable opportunities to enhance the area's nature conservation value and ensure that site users have access to healthy, biodiverse green spaces.'

In the MKA Ecology NE Cambridge Biodiversity Assessment under Section 4.1 '*Biodiversity Vision*' there is important content on page 25 that should not be lost with the focus on a few on site green corridors and offsite enhancement of habitat:

'It is recognised that the higher density approach to the built environment at NEC will make the provision of widespread green space challenging. The built environment must therefore be made more permeable to nature with integrated bird and bat boxes on new structures and extensive areas of living roofs.'

Further, in this section it raises the concern that the offsite habitat enhancement should not mean that biodiversity provision is downgraded in the built environment '*as greenspace is critical for softening the hard edges of urban areas*'

Recommendations 16,19, 20 and 21 are relevant, e.g., '*Recommendation 21: Integrated features for nesting birds should be installed at appropriate densities in appropriate locations*' page 38. For House Sparrow and Swift it is noted that these species have broadly similar requirements in terms of nesting

location and the fact that both nest in colonies, and the proposal is made that a minimum of one swift brick in every building is installed at NEC to cater for both species, which is in line with current Royal Institute of British Architects (RIBA) guidance (reference 1).

Some of these aspects are highlighted in Government Guidance on the NPPF issued on 21 July 2019 (see below):

<https://www.gov.uk/government/news/brookshire-orders-house-builders-to-protect-wildlife>

<https://www.gov.uk/guidance/natural-environment>

Paragraph 23 of this Guidance headed '*How can biodiversity net gain be achieved?*' includes at the end of the first sub paragraph '*Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat.*'

While Swifts will travel far, if necessary, to find food, the enrichment of the habitat close to homes will attract a wider range of other birds into gardens of houses and the environment around apartments. For House Sparrows in particular hedges and shrubs for shelter are important close to potential nest sites.

Cavity nesting birds include Swifts (largely building dependent in the UK), House Sparrows and Starlings (urban birds). These species have nested for generations in older houses in holes and cavities under the eaves and in walls. However, they are in dramatic decline – Sparrows and Starlings are Red Listed and Swifts have declined by 60% in the last 25 years, so the Swift may well move from the Amber to the Red list at the next BoCC revision in 2021. According to IUCN criteria for the potential for extinction in Great Britain, the Swift is labelled as '*Endangered*'.

One big factor in the decline of all three is likely to be the loss of nesting sites through building renovation and insulation and more rigorous standards in new build homes. Further information is available in a recent article (Reference 2) reviewing the conservation status of the Swift, the growing public interest and the urgent action needed to prevent further loss by providing suitable nest sites in new developments.

Evidence is now emerging from studies being undertaken at various sites across the country that swift bricks are being used by a variety of small birds and could be described as a 'universal' brick for small building-dependent species. See link to a recent press release from a Duchy of Cornwall site that is in its second year of collecting data:

<https://nansledan.com/nansledan-residents-asked-to-help-with-bird-box-survey/>

Across the country, Swifts, House Sparrows, House Martins, Blue Tits, Great Tits, Starlings and Nuthatches have all been recorded nesting in swift bricks.

This is also very good news for developers as it means that one brick type will provide a very cost-effective ecological enhancement for a variety of bird species. These integral swift bricks are very easy to include in routine building practices with a range of sizes and finishes to suit all types of building resulting in an inexpensive biodiversity enhancement with the nesting site confined within the brick with no access to the roof space or cavity.

At least a 1:1 ratio of nest bricks per dwelling is generally accepted now as good practice – a level of provision outlined in the award-winning Exeter City Council Residential Design Guide SPD (2010). Representatives of the RSPB South West Regional Office have been working with Exeter Planners over a period of 10 years on the implementation of the biodiversity requirements of this guide and there is

acceptance that in many cases the most suitable box type for all cavity nesting birds is the integral swift brick.

A similar standard was adopted by the Town and Country Planning Association and the Wildlife Trusts in 2012 (Reference 3) and by RIBA in 2013 (Reference 1).

Examples of recent Planning Authority Guidance on the level of provision include the Oxford City Council Technical Advice Note on Biodiversity (Reference 4), which gives an 'expected provision' of bird nest sites for building dependent birds (i.e. Swifts) at a rate of 1 per house and 1 per 2 flats, with separate provision for bats at a rate of 1 per 5 houses. Provision of such nest bricks in schools, student accommodation and hotels is addressed by a ratio of 1 per 250 m² floor space.

https://www.oxford.gov.uk/info/20067/planning_policy/745/planning_policy_-_technical_advice_notes_tan

Local Case Studies:

There are a number of nest box schemes in new and existing developments in the Cambridge area, which have resulted in many pairs of successfully breeding Swifts and House Sparrows. For example, the Swifts Development, Fulbourn, where an estimated 100 pairs of Swifts (and in 2014, 9 pairs of House Sparrows were recorded) are nesting in 286 boxes (mainly in the integral ones), Edgecombe Flats, Cambridge – 34 pairs of Swifts and over 30 pairs of House Sparrows occupying 70 swift boxes – and Gunhild Way, Queen Edith's – 20 pairs of Swifts occupying 50 swift boxes. As a result of nest box projects some villages around Cambridge have made an excellent start in re-establishing Swifts, for example Landbeach has seen an increase from 4 pairs to over 50 pairs, Dry Drayton from zero to 19 pairs and Elsworth from zero to 8 pairs. These schemes are proving very successful in enhancing the Swift population in the Greater Cambridge area at a time when there is a general marked decline across the United Kingdom.

We conclude that provision of integral swift bricks, at a ratio of at least 1:1 per dwelling with adjusted provision for blocks of flats, schools, community buildings and commercial premises is the modern standard to accommodate a range of cavity nesting birds in new developments.

We urge that Policy 5 should include specific wording on the provision of integral swift bricks in all buildings, at a ratio of at least 1:1 per dwelling, with adjusted provision of 1 per 2 flats and other premises, at a ratio of 1 per 250m² floor space, as part of bringing nature closer to people.

References:

1. Gunnell, K., Murphy, B. and Williams, C., Designing for Biodiversity: A technical guide for new and existing buildings, RIBA Publishing & Bat Conservation Trust (2013).
2. Day, J., Mayer, E., Newell, R., (2019), 'inpractice' – Bulletin of the Chartered Institute of Ecology and Environmental Management, Issue 104 June, p.38
3. Planning for a Healthy Environment; Good Practice for Green Infrastructure and Biodiversity. The Town and Country Planning Association and The Wildlife Trusts (2012).
4. Oxford City Council Technical Advice Note: Biodiversity – Planning Application Guidance available at: https://www.oxford.gov.uk/info/20067/planning_policy/745/planning_policy_-_technical_advice_notes_tan

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nest brick and nest box installations in new developments, advising commercial swift nest box designers, house designers and developers both locally and nationally.

Further information is available at:

<https://actionforswifts.com>

<https://www.scambs.gov.uk/swift-community-action-to-help-amazing-birds-in-south-cambs/>

Completed response forms must be received **by 5pm on Monday 5 October 2020**. These can be sent to us either by:

Email: nec@greatercambridgeplanning.org or post, to:

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